

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA
Plaintiff,

v.

C.A. No. 1:13-cv-00442-JJM-PAS

STATE OF RHODE ISLAND
Defendant.

**STATE OF RHODE ISLAND'S RESPONSE TO THE SECTION XIX(3) NOTICE OF
THE UNITED STATES OF AMERICA**

Now comes the Defendant, State of Rhode Island and responds to the Section XIX(3) notice of the United States as follows:

1. The State of Rhode Island contests the assertions of the United States of America;
2. The State of Rhode Island sets forth its position in the attached memorandum;
3. The State of Rhode Island requests a hearing for this Court to make determinations regarding the definition of Substantial Compliance and whether the State meets that definition under the ISA.¹

Defendant,
By their Attorneys,

/s/ Marc DeSisto

/s/ Kathleen A. Hilton

Marc DeSisto, Esq. (#2757)

Kathleen A. Hilton, Esq. (#9473)

DeSisto Law LLC

60 Ship Street

Providence, RI 02903

marc@desistolaw.com

katie@desistolaw.com

¹ The United States has asked for a status conference not a hearing.

CERTIFICATE OF SERVICE

I hereby certify that the within document has been electronically filed with the Court on this 30th day of December 2019 and is available for viewing and downloading from the ECF system.

Amy Retsinas Romero, Esq.
Amy.romero@usdoj.gov

Nicole K. Zeitler, Esq.
Nicole.zeitler@usdoj.gov

Jillian Lenson, Esq.
Jillian.Lenson2@usdoj.gov

Victoria L. Thomas, Esq.
Victoria.Thomas@doj.gov

Lindsey M. Weinstock, Esq.
Lindsey.weinstock@usdoj.gov

William J. Conley, Jr., Esq.
wconley@wjclaw.com

Mary Ann Carroll, Esq.
macarroll@hcllawri.com

/s/ Marc DeSisto
